

Fareed I. Kaisani, State Bar No. 24104017
BAKER BOTTS L.L.P.
2001 Ross Avenue, Suite 900
Dallas, Texas 75201
Telephone: (214) 953-6500
Fax: (214) 953-6503
fareed.kaisani@bakerbotts.com

Emanuel Grillo, Esq. (admitted *pro hac vice*)
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, New York 10012-4498
Telephone: (212) 408-2500
Facsimile: (212) 259-2501
emanuel.grillo@bakerbotts.com

**COUNSEL FOR DIANE G. REED,
CHAPTER 7 TRUSTEE**

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)	Chapter 7
)	
ERIC C. BLUE, et al.¹)	Case No. 19-33568-7
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF NON-COMPLIANCE WITH CONTEMPT ORDER

Diane G. Reed (the “Trustee”), the duly appointed Chapter 7 trustee of the above captioned administratively consolidated estates of Eric C. Blue (“Blue”), Capital Park Private Equity Partners, LLC (“Capital Park PEP”), and Capital Park Management Company, LLC (“Capital Park MC”, and collectively, the “Debtors”) hereby files this *Notice of Non-Compliance with Contempt Order* (the “Notice”), respectfully stating as follows:

1. On September 3, 2020, the Court entered its *Order Finding Eric C. Blue in Contempt of Court and Requiring Turnover of Financial Records* [Docket No. 83] (the “Contempt Order”).
2. The Contempt Order found Debtor Eric C. Blue (“Blue”) to be in contempt of Court and required Blue to take certain actions by September 11, 2020 to purge his contempt.

¹ The Debtors in these jointly administered chapter 7 cases are Eric C. Blue, Capital Park Management Company, LLC, and Capital Park Private Equity Partners, LLC.

3. The Contempt Order also provides that if Blue fails to purge his contempt by September 11, 2020, then the Trustee may request the Court to hold a show cause hearing on September 22, 2020 to determine the need for additional sanctions against Blue.

4. On September 3, 2020, the undersigned counsel for the Trustee served the Contempt Order on Blue and apparent counsel for Bridgeway National Corporation, an entity believed to be affiliated with Blue. Specifically, the Contempt Order was served on the following persons with their respective addresses:

Eric C. Blue 1213 O Street NW Washington DC, 20005 Eric.Blue@bridgewaynational.com Eric.Blue@capitalpark.net	Eric C. Blue 3140 Harvard Avenue, Suite 402 Dallas, Texas
Gutiérrez Bergman Boulris, PLLC Attn: Dale S. Bergman 900 Ponce de Leon Blvd., Suite 303 Coral Gables, FL 33134 Dale.Bergman@gbppl.com	Eric C. Blue Bridgeway National Corp. 1015 15th Street NW, Suite 1030 Washington DC 20005

5. On September 3, 2020, the undersigned counsel filed the Certificate of Service at Docket No. 84, evidencing service of the Contempt Order on the above persons.

6. The Trustee certifies that as of the filing of this Notice, Blue has not complied with the Contempt Order. Accordingly, the Trustee respectfully requests that the Court hold a show cause hearing on **September 22, 2020 at 9:30 am central time** to determine what additional sanctions are needed to compel Blue to cooperate with the Trustee's investigation of the Debtors' assets and financial affairs.

[remainder of page intentionally blank]

RESPECTFULLY SUBMITTED this 14th day of September 2020.

BAKER BOTTS L.L.P.

/s/ Fareed Kaisani

Fareed I. Kaisani, State Bar No. 24104017
2001 Ross Avenue, Suite 900
Dallas, Texas 75201-2980
Telephone: (214) 953-6500
Facsimile: (214) 953-6503
Email: fareed.kaisani@bakerbotts.com

-and-

Emanuel Grillo, Esq. (admitted *pro hac vice*)
30 Rockefeller Plaza
New York, New York 10012-4498
Telephone: (212) 408-2500
Facsimile: (212) 259-2501
emanuel.grillo@bakerbotts.com

**COUNSEL FOR DIANE G. REED,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 14th day of September, 2020, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof and that, additionally, on the same date he caused true and correct copies of this document to be served by email and United States Mail on the following persons.

Eric C. Blue 1213 O Street NW Washington DC, 20005 Eric.Blue@bridgewaynational.com Eric.Blue@capitalpark.net	Gutiérrez Bergman Boulris, PLLC Attn: Dale S. Bergman 900 Ponce de Leon Blvd., Suite 303 Coral Gables, FL 33134 Dale.Bergman@gbppl.com
Eric C. Blue 3140 Harvard Avenue, Suite 402 Dallas, Texas	Eric C. Blue Bridgeway National Corp. 1015 15th Street NW, Suite 1030 Washington DC 20005

/s/ Fareed Kaisani
Fareed Kaisani, Esq.